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16
17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 George J. Hannon,
21
22 Plaintiff,
23
24 -against-
25 American Express Company, *et al.*,
26 Defendants,
27
28 -and-
29 Wells Fargo & Company,
30
31 Nominal Defendant.

Case No. 17-cv-07236-JST

**STIPULATION AND PROPOSED
ORDER REGARDING EXTENSION OF
TIME TO ANSWER OR OTHERWISE
RESPOND TO THE COMPLAINT**

32 Pursuant to Civil Local Rule 6-1, defendant American Express Company (“**Defendant**”)
33 and plaintiff George J. Hannon (“**Plaintiff**”) hereby stipulate and agree with reference to
34 the following:

35 A. Plaintiff filed a complaint in this case against Defendant on December 20, 2017
36 (the “**Complaint**”).

**STIPULATION AND PROPOSED ORDER REGARDING EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO THE COMPLAINT**

- 1 B. The Complaint was served on Defendant on December 28, 2017.
- 2 C. On January 16, 2018, Plaintiff and Defendant agreed to extend the time for
- 3 Defendant to answer, move with respect to, or otherwise respond to the Complaint
- 4 to February 20, 2018.
- 5 D. On January 23, 2018, the Court scheduled a Case Management Conference for
- 6 March 28, 2018 at 2:00 p.m.
- 7 E. Plaintiff and Defendant have now agreed to further extend the deadline for
- 8 Defendant to answer, move with respect to, or otherwise respond to the Complaint
- 9 by an additional 30 days to March 22, 2018.
- 10 F. In addition, to the extent Defendant moves to dismiss the Complaint, Plaintiff and
- 11 Defendant agree to set (i) April 12, 2018 as the deadline for Plaintiff to file an
- 12 opposition to Defendant's motion to dismiss and (ii) May 3, 2018 as the deadline
- 13 for Defendant to file a reply in further support of Defendant's motion to dismiss.

14 **Terms of Stipulation**

- 15 1. The time for the Defendant to answer, move with respect to, or otherwise respond
- 16 to the Complaint shall be extended through and including March 22, 2018.
- 17 2. To the extent Defendant moves to dismiss the Complaint, Plaintiff and Defendant
- 18 shall comply with the following schedule: (i) April 12, 2018 as the deadline for
- 19 Plaintiff to file an opposition to Defendant's motion to dismiss; and (ii) May 3,
- 20 2018 as the deadline for Defendant to file a reply in further support of Defendant's
- 21 motion to dismiss.

22 **IT IS SO STIPULATED.**

23 Dated: February 16, 2018

**FARMER BROWNSTEIN JAEGER & GOLDSTEIN
LLP**

24
25 By: /s/ David C. Brownstein

26 David C. Brownstein
27 Attorney for Defendant
28 American Express Company

1
2 Dated: February 16, 2018

BOTTINI & BOTTINI, INC.

3 By: /s/ Albert Y. Chang

4 Albert Y. Chang

5 Francis A. Bottini, Jr. (SBN 175783)

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22 Attorney for Plaintiff

23 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

24 I, David C. Brownstein, in compliance with General Order 45, Section X(B), hereby
25 attest that I obtained the concurrence of all of the above-listed counsel in filing this
26 document.

27 /s/ David C. Brownstein

28 David C. Brownstein

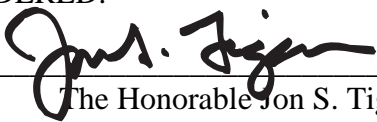
Attorney for Defendant

American Express Company

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 22, 2018



The Honorable Jon S. Tigar
United States District Judge